

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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WE SHALL OVERCOME FOUNDATION,
and BUTLER FILMS, LLC, on behalf of
themselves and all others similarly situated,

Case No: 1:16-cv-02725-DLC

NOTICE OF MOTION

Plaintiffs,

v.

THE RICHMOND ORGANIZATION, INC.
(TRO, INC.) and LUDLOW MUSIC, INC.,

Defendants.

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Upon this Motion, dated October 16, 2017, the supporting memorandum of law, the request for judicial notice, and upon all prior proceedings had herein, Defendants The Richmond Organization, Inc. and Ludlow Music, Inc. (collectively, “Defendants”), by their attorneys, hereby respectfully move this Court, in accordance with Rule 6.1 of the Local Civil Rules of the Southern and Eastern Districts and Rule 3 of the Individual Practices of this Court, before the Honorable Denise L. Cote, at the United States District Courthouse, Courtroom 15B, 500 Pearl Street, New York, New York, 10007, for an order, pursuant to Fed. R. Civ. P. 12(b)(1), dismissing Plaintiffs’ remaining claims in their Amended Class Action Complaint for the reasons set forth in the accompanying memorandum of law.

Dated: New York, New York
October 16, 2017

Respectfully submitted,

ROBINS KAPLAN LLP

By: /s/ Paul V. LiCalsi

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